

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:

EARLE STANLEY GREER,
Debtor.

Bankruptcy No. 18-18146ELF
Chapter 11

ORDER

AND NOW, this day of , 2019, after hearing, the Trustee's
Motion to Dismiss is Denied. Debtor is hereby allowed to continue his case as a Chapter
11 debtor.

FOR THE COURT:

Interested parties:

Dave P. Adams
Office of the United States Trustee
200 Chestnut Street, Suite 502
Philadelphia, PA 19106
215 597-4411
215 923-1293 (fax)
Dave.p.adams@usdoj.gov

Hon. Eric L. Frank, B.J.

Earle Stanley Greer
3 Carriage Lane
Lansdowne, PA 19050

City of Philadelphia
PAMELA ELCHERT THURMOND
Deputy City Solicitor
PA Attorney I.D. 202054
Attorney for the City of Philadelphia
City of Philadelphia Law Department
1401 JFK Boulevard, 5th Floor

Philadelphia, PA 19102-1595
215-686-0508 (phone)
Email: Pamela.Thurmond@phila.gov

Valerie A. Hibbert, Esquire
18 North Lansdowne Avenue
Lansdowne, P A 19050
Telephone: 610.622.3660
vah963@gmail.com
Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: _____ :
:
EARLE STANLEY GREER, :
:
Debtor. :
_____ :

Bankruptcy No. 18-18146ELF
Chapter 11
HEARING TO BE HELD
Date: December 4, 2019
Time: 11:00 a.m.
Place: Courtroom #1

DEBTOR'S ANSWER TO CITY OF PHILADELPHIA'S MOTION TO DISMISS OR
CONVERT TO CHAPTER 7

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania, Debtor answers as follows:

1. thru 3. Admitted.
4. thru 6. The Debtor is in the process of filing or has filed all defective schedules and statements.
7. and 8. Admitted.
9. thru 12. Debtor expects to pay or make arrangements to pay all outstanding post-petition arrearages by the hearing date.
13. thru 16. Admitted.
17. Debtor expects to pay or make arrangements to pay all outstanding post-petition arrearages by the hearing date.
18. The Debtor is in the process of filing or has filed all defective schedules and statements.
19. thru 22. Debtor is up to date and has agreements with all his secured creditors. Any changes in this case will wipe out Debtor and the secured creditors. The taxing authorities in Delaware county are working with him. If not for the City of Philadelphia, it's their

money and they want it now, Debtor would not need this case. He needs help with what he owes the City so that all others can be made whole.

WHEREFORE, Debtor respectfully requests that he be allowed to continue in this Bankruptcy as a Chapter 11 debtor.

Respectfully submitted,

/s/ Earle Stanley Greer

Date: November 18, 2019

Earle Stanley Greer
Debtor

By: *Valerie A. Hibbert, Esq.*

Valerie A. Hibbert, Esquire
18 North Lansdowne Avenue
Lansdowne, P A 19050
Telephone: 610.622.3660
vah963@gmail.com
Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re:

EARLE STANLEY GREER,

Debtor.

Bankruptcy No. 18-18146ELF
Chapter 11

CERTIFICATE OF SERVICE

I, Valerie A. Hibbert, Esq., do hereby certify that true and correct copies of Debtor's Answer to City of Philadelphia's Motion to Dismiss has been served this 18th day of November, 2019 by first class mail upon those listed below:

Dave P. Adams
Office of the United States Trustee
200 Chestnut Street, Suite 502
Philadelphia, Pennsylvania 19106

City of Philadelphia
PAMELA ELCHERT THURMOND
Deputy City Solicitor
PA Attorney I.D. 202054
Attorney for the City of Philadelphia
City of Philadelphia Law Department
1401 JFK Boulevard, 5th Floor
Philadelphia, PA 19102-1595
215-686-0508 (phone)
Email: Pamela.Thurmond@phila.gov

Valerie A. Hibbert, Esq.

Valerie A. Hibbert, Esq.
Attorney for Debtor